

Consumer Products Division

August 11, 2003

Office of Nutritional Products, Labeling, and Dietary Supplements (HFS-810)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740-3825

Dear Sir or Madam,

This notification is on behalf of ZAND® Herbal Formulas and their Parent company Botanical Laboratories, Inc., 1441 West Smith Road, Ferndale, WA 98248.

We intend to include the following statement of nutritional support based on substantiation data supporting the use of Echinacea root on the following products.

Ingredient:

Echinacea

Statement:

Immune support

Products:

insure™ WellnessToday™

insure™ ViroPlus™

The above statements are accompanied by the required disclaimer pursuant to Section 6 of the Dietary Supplement Health and Education Act.

Please be advised that the information contained herein is, to the best of our knowledge and information, accurate. Our firm has information substantiating that the above statement is truthful and not misleading.

Sincerely yours,

Kloud Coll Kevin H. Cobb

Director of Marketing

ZAND® Herbal formulas

Botanical Laboratories, Inc.

978 0162 LET 12770

ZAND

HERBS for KIDS

NatraBio¹

bioAllers®